



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

DEC 20 2012

CERTIFIED MAIL: RETURN RECEIPT REQUESTED #7010 2780 0002 4355 0347

GENERAL NOTICE LETTER, URGENT LEGAL MATTER - PROMPT REPLY NECESSARY

Dean Coulson
Resolve/ESCO Marine
7002 Marvin Berry Rd., Suite B
Corpus Christi, Texas 78409



Ref: U.S. Oil Recovery Superfund Site, Pasadena, Harris County, Texas

Dear Sir:

The purpose of this letter is to notify you of Resolve/ESCO Marine's potential liability at the U.S. Oil Recovery (USOR) Superfund Site ("the Site.") Currently there is an ongoing removal action designed to stabilize the Site, remove the immediate threat posed at the Site and set the stage for a later, more comprehensive response action.

The USOR Superfund Site is located on two parcels of land -- one located at 400 North Richey Street and one at 200 North Richey Street, in Pasadena, Harris County, Texas. The Site includes a warehouse, retention pond and several containment areas throughout, as well as above ground storage tanks, totes, drums, roll-off containers, secondary containment area, including an office area and a building that houses boxes of records. U.S. Oil Recovery LLP and/or MCC Recycling LLP received municipal and industrial Class I and Class II wastewater, characteristically hazardous waste, used oil and oily sludges, and municipal solid waste. The MCC property, located at 200 North Richey Street, and which is also a part of the Site, is bordered by commercial businesses on each side and is split into two sections by Vince Bayou.

A Superfund Site is a place that is contaminated with hazardous substances at levels that may present a threat to human health or the environment. Under Sections 106 and 107 of CERCLA, 42 U.S.C. §§ 9606 and 9607, potentially responsible parties (PRPs) may be required to perform cleanup actions to protect the public health and welfare or the environment. PRPs include current and former owners and operators of the Site, as well as persons who sent or transported hazardous substances to the Site for disposal or treatment, or who arranged for the disposal or treatment of hazardous substances at the Site.

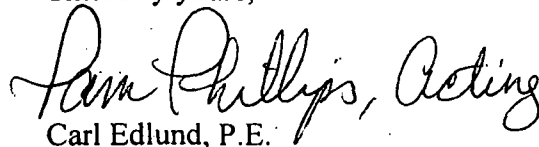
Based on the information collected, the EPA believes that Resolve/ESCO Marine may be liable under Section 107(a) of CERCLA with respect to the Site as a person who by contract, agreement, or otherwise arranged for disposal or treatment, or arranged with a transporter for transport for disposal or treatment, of hazardous substances owned or possessed by such person. Enclosure A explains the General Notice and Removal Action, and offers you the opportunity to enter into the August 25, 2011, Administrative Order on Consent (AOC) as a Settling Party concerning the cleanup of the Site. Enclosure B explains the basis for the EPA's determination that Resolve/ESCO Marine is a PRP. Also included in this letter as Enclosure C is the Small Business Resource Fact Sheet. Enclosure D is the AOC and the Statement of Work (SOW). (ALL ENCLOSURES ARE CONTAINED ON THE ENCLOSED CD)

The EPA invites you to participate in the performance of the on-going work under the AOC. You should contact Mr. Randy Smith at 603-673-0004, who is leading the PRP Steering Committee for the PRPs.

Upon reviewing the enclosed Notice (Enclosure A), please provide a written response to Ms. Cynthia Brown, Removal Enforcement Coordinator, at 214-665-7480 within **30 days** after receipt of this letter to let her know whether you will enter into the AOC that addresses the current response at the Site.

If you have questions regarding the notice or any of the other documentation included, please contact Ms. Brown at 214-665-7480, or at brown.cynthia@epa.gov. Questions concerning legal matters should be directed to EPA attorney Mr. Edwin Quinones at 214-665-8035, or quinones.edwin@epa.gov. Thank you for your attention to this matter.

Sincerely yours,

A handwritten signature in cursive script that reads "Carl Edlund, P.E." followed by the word "Acting" in a slightly larger, more stylized cursive font.

Carl Edlund, P.E.
Director
Superfund Division

Enclosures (4)



Western Gulf Recycling

December 27, 2012

Ms. Cynthia Brown
Removal Enforcement Coordinator (6SF-TE)
Environmental Protection Agency, Region 6
1445 Ross Ave., Suite 1200
Dallas, Texas 75202-2733

Re: U.S. Oil Recovery Superfund Site, Pasadena, Harris County, Texas

Dear Ms. Brown:

Western Gulf Recycling received a letter yesterday that was addressed to one of our employees, Dean Coulson, but for the company Resolve/ESCO Marine. Western Gulf Recycling is not associated in any way with Resolve/ESCO Marine and Dean Coulson has never been employed by that company.

There is no company by the name of Resolve/ESCO Marine operating at 7002 Marvin Berry Road, Corpus Christi, Texas. I have included a copy of the letter we received for reference.

Best regards,

Melissa Starr
Office Manager

Enclosure

cc: Carl Edlund, P.E.
Director, Superfund Division

RECEIVED
13 JAN - 2 PM 7:45
SUPERFUND DIV.
REGIONAL OFFICE



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

DEC 20 2012

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RECEIVED DEC 26 2012

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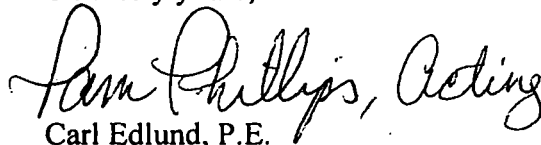
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Sincerely yours,

A handwritten signature in cursive script that reads "Carl Edlund, Acting".

Carl Edlund, P.E.
Director
Superfund Division

Enclosures (4)

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Dean Coulson
Resolve/ESCO Marine
7002 Marvin Berry Rd., Suite B
Corpus Christi, Texas 78409

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PS Form

Instructions

7010 2780 0002 4355 0347

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Dean Coulson
Resolve/ESCO Marine
7002 Marvin Berry Rd., Suite B
Corpus Christi, Texas 78409

2. Article Number
(Transfer from service label)

7010 2780 0002 4355 0347

COMPLETE THIS SECTION ON DELIVERY**A. Signature****X**

- ☐ Agent
☐ Addressee

B. Received by (Printed Name)

John Longoria

C. Date of Delivery

12-26-07

- D. Is delivery address different from item 1?** ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Certified Mail ☐ Express Mail
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☐ Insured Mail ☐ C.O.D.

- 4. Restricted Delivery? (Extra Fee)** ☐ Yes

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U. S. Environmental Protection Agency
Region VI (6SF-TE)
Attn: Cynthia Brown
1445 Ross Avenue, Suite 1200
Dallas, TX 75202

